

in the parent claim. As best understood from a reading of the claim in light of the specification, 'the characteristics' is taken to mean that the tasks are drawn from the regulatory requirements, service commitments, and best practices on insurance claims processing." Applicants have replaced the phrase "characteristics" with "identified rules," that has antecedent basis in Claim 22. Applicants respectfully request the Examiner to withdraw his rejection to this claim.

The Examiner rejected Claims 33 and 51 under 35 U.S.C. § 112, 1<sup>st</sup> paragraph as containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s) at the time of the application was filed, had possession of the claimed invention. The Examiner stated: "There is no 'library rules interface' disclosed in the specification and thus inputting, storing, and editing rules in 'said rules database' is not supported by the specification. There is no 'task library administrator interface' disclosed in the specification."

Applicants respectfully disagree with the Examiner because there is a library rules interface and a task library administrator interface disclosed in the specification. The specification discloses a task librarian that maintains the task library. (Specification, page 181, lines 10-16). The librarian defines rules that cause tasks to be placed on task lists based on claim characteristics or dates that define when tasks are due. In addition, the specification discloses an interface for the user or task librarian, which allows the task librarians to define tasks and the rules that create them which are used by the Task Engine. (Specification, page 184, lines 5-10).

Applicants respectfully request the Examiner to withdraw his rejection to these claims.

#### **Applicant's Invention as Presently Claimed**

Applicant's invention pertains to a system for generating tasks to be performed in an insurance organization; it includes an insurance transaction database, a task library database, a client component and a server component. The insurance transaction database stores information related to an insurance transaction. The task library database stores rules for determining tasks to be completed upon an occurrence of an event. The client component is in communication with the insurance transaction database to receive

information relating to the insurance transaction. The server component is in communication with the client component, the transaction database and the task library database where the server component receives and processes information associated with these components. When there is a change in the insurance transaction information, a task engine on the server component is alerted of the change in insurance information. Next, the server component retrieves the relevant rules from the task library database and applies the rules to the information to determine tasks to be completed. When the tasks have been determined they are stored on the server component, then the tasks are transferred to the client component.

This system enables a specific task to be generated responsive to a specific change of insurance transaction information. The innovative aspect of the claimed invention is based on rules in a separate database maintained by users of the computer programmer system. With the claimed system, an appropriate task is quickly and efficiently generated to meet the needs of the insurance organization, which assists the claim handler to process the insurance transaction.

### **35 U.S.C. § 102(b)**

The Examiner rejected Claims 22-51 under 35 U.S.C. § 102(b) as being anticipated by Abbruzzese et al. Applicants respectfully traverse the rejection. Applicants respectfully submit that the claims are not described or suggested by Abbruzzese.

Independent Claim 22 recites, “wherein the event processor is triggered by application events associated with a change in the information, and sends an event trigger to the task engine; wherein in response to the event trigger, the task engine identifies rules in the task library database associated with the event and applies the information to the identified rules to determine the tasks to be completed, and populates on a task assistant the determined tasks to be completed, wherein the task assistant transmits the determined tasks to the client component.” Since Independent Claims 31 and 36 incorporate the same features of Claim 22 recitations of Claims 31 and 36 are not included herein. In addition, the arguments that apply to Claim 22 also apply to Independent Claims 31 and 36.

Abbruzzese et al. discloses an invention that provides claim office supervisors and other staff members with the ability to maintain an accurate record of all activities undertaken in the processing of a claim and the further ability to quickly and easily access the complete claim file. (Column 3, lines 11-17). In addition, Abbruzzese et al discloses "an operator accesses the local computer through a terminal, where he requests (usually through a displayed menu) a series or input screens called the Loss Protection Transaction ('LPTX')." (Column 3, lines 45-50). An operator is able to manually input information for a Loss Notice associated with an insurance business, for example workmen's compensation, automobile, property/liability, fidelity/surety etc, into a series of LPTX screens on a computer, where this information is inputted into a claim file created with the LPTX and stored at a local database. Next, this information is routed to a supervisor or a claim handler for claim processing. (Column 3, lines 45-62 and Column 4, lines 5-45).

The Examiner stated: "*The task library database for storing rules for determining tasks to be completed upon an occurrence of an event* is functionally equivalent to the series of input screens called Loan Processing transactions (LPTX) in the prior art, whose presentation embodies 'rules' for performing tasks related to each particular line of business subject to the claim (column 3, line 44, to column 4, line 44). Rules for determining tasks are inherent in the order and presentation of the input screens for each claims process. For example, Figure 1 shows at least one rule for determining the task 'MAKE COPY', i.e., if the Notice of Loss is not received in duplicate, then make a copy. The task library is the collection of these rules and screens that form the LPTX." (Office Action, page 6, lines 17-24).

Abbruzzese et al., however, does not anticipate, disclose or suggest that the LPTX screen is a task library database containing rules for processing claim information to determine a task to be completed. In fact, Abbruzzese fails to disclose or suggest the claimed arrangement. In particular, Abbruzzese et al., states that, "The LPTX is designed to capture information relevant to claim recording and to the loss adjustment process." (Column 3, lines 65-66).

The LPTX screen, unlike the task library database of Claim 1, is generated from a fixed software coded program on a computer or server component. The LPTX screen

captures information related to Loss of Notice Information. The task library database, distinct from the LPTX screen, is readily accessible and easily changed by any authorized user and it is separated from the server component processing the claim information. In addition, the LPTX screen uses a local database to store the information it receives from the Loss of Notice information. Contrary to the task library database, the local database of Abbruzzese does not contain rules to process any of the information received based on identified rules, because the local database is merely a storage system that contains information captured through the LPTX screens. (Column 3, lines 66-67 and Column 4, lines 1-26). Abbruzzese et al. does not disclose that the LPTX screen is a task library database that is updateable and processes any of the information received based on identified rules associated with a claim, because the LPTX screen only captures information relevant to a claim and it is not easily changed by any user.

Additionally, the LPTX screen and the local database are not functionally equivalent to the task library database. To the extent that the LPTX screen embodies “rules” for data entry or tasks, the LPTX screen does not apply the claim information to any rules in a task library database and then determines a task to be completed based on applying the claim information to an identified rule. Rather any “rules” or “tasks” embodied in the LPTX screens are predetermined and independent of any data entry. The data entry does not invoke the identification of risks from a database, and then apply the data to the risks to determine tasks to then be completed, which is required by the present claims.

For the foregoing reasons, Claims 22, 31 and 36 are not anticipated by Abbruzzese et al. Claims 23-30, 32-35 and 37-51 depend from independent Claims 22, 31 and 36. Therefore, Claims 23-30, 32-35 and 37-51 also are not anticipated by Abbruzzese et al. as claims dependent upon allowable base claims.

#### ***Claims 23, 33, 35 and 51***

The Examiner rejected Claims 23, 33, 35 and 51 under 35 U.S.C. § 102(b) as being anticipated by Abbruzzese et al. Applicants respectfully traverse the rejection. Applicants respectfully submit that the claims are not described or suggested by Abbruzzese.

Claim 23 recites, "The system of Claim 22, further comprising a task library administrator interface for adding or editing rules and tasks in the task library database." Since Claims 33, 35 and 51 incorporate the same features of Claim 23, recitations of Claims 33, 35 and 51 are not included herein. In addition, the arguments that apply to Claim 23 also apply to Claims 33, 35 and 51.

In the Office Action, the Examiner asserts that "Abbruzzese discloses a task library database for storing rules for determining tasks to be completed upon an occurrence of an event is functionally equivalent to the series of input screens called Loan Processing Transactions (LPTX) in the prior art, whose presentation embodies 'rules' for performing tasks related to each particular line of business subject to the claim (column 3, line 44, to column 4, line 44). To prepare such LPTX screens requires the use [sic] an interface for entering the rules for determining tasks and the order and presentation of the LPTX input screens for each claims process. Thus, claim 51 is present in Abbruzzese in at least the *programmer's* interface for creating the LPTX screens." (Office Action, page 11, lines 19-24 and page 12, lines 1-2).

Abbruzzese et al., however, does not anticipate, disclose or suggest the utilization of a task library administrator interface that allows any authorized user to add or edit rules in the task library database or the LPTX screen. Abbruzzese discloses a programmer's interface for creating the LPTX screens to allow a software programmer to create or alter the coding for the screens. On the other hand, this task library administrator interface provides an advantage over Abbruzzese, because no coding is required. The work flow management of the claim information, as required by the present claims is embodied in the rules in the task library database, not in the program code as it is in Abbruzzese.

For the foregoing reasons, Claims 23, 33, 35 and 51 are not anticipated by Abbruzzese et. al.

#### ***Claim 24***

The Examiner rejected Claim 24 under 35 U.S.C. § 102(b) as being anticipated by Abbruzzese et al. Applicants respectfully traverse the rejection. Applicants respectfully submit that the claims are not described or suggested by Abbruzzese.

Claim 24 recites, “wherein the task library includes a list of all standardized tasks.” The Examiner stated, “Abbruzzese discloses work management of insurance claims processing that would necessarily be determined by ‘characteristics’ governed by regulation, account servicing commitments, and best practices in insurance claim processing, and one skilled in the art would have recognized such characteristics as inherent to the design of an insurance claims processing system which Abbruzzese is exemplary. The library of tasks thus consists of a ‘standardized’ list of tasks based on these ‘characteristics’.” (Office Action, page 10, lines 22-26).

Abbruzzese et al., however, does not anticipate, disclose or suggest that the LPTX screen includes a list of standardized tasks. In fact Abbruzzese fails to disclose or suggest using the LPTX screen as a task library database that includes a list of all standardized tasks. More specifically, the LPTX screen, as stated above, is merely an input screen for formatting claims based on the particular business, for example property or automobile claims. When the LPTX screen receives the claims information, then this information is routed to a supervisor or claims handler. (Column 4, lines 1-50). At no point during the processing of the claim information on the LPTX screen does this information include a list of standardized tasks. Abbruzzese does not disclose that any list of tasks is in a database maintained for use by the supervisor or claim handler. Therefore, Abbruzzese et al., does not anticipate, disclose or suggest that the LPTX screen includes a list of standardized tasks.

For the foregoing reasons, Claim 24 is not anticipated by Abbruzzese et. al.

#### ***Claims 42 and 49***

The Examiner rejected Claims 42 and 49 under 35 U.S.C. § 102(b) as being anticipated by Abbruzzese et al. Applicants respectfully traverse the rejection. Applicants respectfully submit that the claims are not described or suggested by Abbruzzese et al.

Claim 42 recites, “wherein the policy level further comprises information related to covered yacht for marine claims.” The Examiner stated: “Abbruzzese discloses different lines of insurance, i.e., workmen’s comp, automobile, property/liability, etc (column 3, lines 59-64) and LPTX screens to collect information particular to each.”

(Office Action, page 11, lines 16-18). Since Claim 49 incorporates the same features of Claim 42, a recitation of Claim 49 is not included herein. In addition, the arguments that apply to Claim 42 also apply to Claim 49.

Abbruzzese et al., however, does not anticipate, disclose or suggest that there is a policy level that comprises information related to covered yacht for marine claims. In fact, Abbruzzese fails to disclose or suggest using a policy level that includes information related to covered yacht for marine claims. Abbruzzese discloses, "A separate series of LPTX screens is typically available for each line of insurance business (e.g. workmen's compensation, automobile, property/liability, fidelity/surety, etc.). Thus, the particular LPTX screens which are displayed to the input operator are formatted according to the particular line of business which is the subject of the claim." (Column 3, lines 59-65). Abbruzzese discloses various policy levels, but does not disclose a policy level for a covered yacht for marine claims. This reference uses the term "etc.," but this term does not specifically disclose yacht for marine claims. Therefore, Abbruzzese et al. does not anticipate, disclose or suggest that there is a policy level that comprises information related to a covered yacht for marine claims.

For the foregoing reasons, Claims 42 and 49 are not anticipated by Abbruzzese et al.

#### ***Claim 50***

The Examiner rejected Claim 50 under 35 U.S.C. § 102(b) as being anticipated by Abbruzzese et al. Applicants respectfully traverse the rejection. Applicants respectfully submit that the claims are not described or suggested by Abbruzzese et al.

Claim 50 recites, "wherein the line level further comprises information related to events, damages and negotiation." The Examiner states, "Abbruzzese discloses collection of specific information on the policy, the claim, the participant (insured), and line of property (see Tables IV to XX). These are the *levels* described by the specification as different groups of information collected for claims processing. Abbruzzese discloses a 'claim folder' as the collection of information on a claim in the Loss Claim database." (Office Action, page 11, lines 3-7).

Abbruzzese et al., however, does not anticipate, disclose or suggest that the line level comprises information related to events, damages and negotiation. In fact Abbruzzese et al. fails to disclose or suggest using a line level that comprises information related to events, damages and negotiation. In particular, Abbruzzese et al. discloses that “As the claim handler processes the claim he normally accesses various functions in the system including the . . . Payment transaction etc. When a form, letter or check needs to be prepared, the appropriate function is accessed through a keyboard 68 . . .” (Column 13, lines 20-38). Abbruzzese et al. discloses that the claim handler can process the claim by issuing a check for a payment transaction, but the reference does not disclose that the claim handler can negotiate any aspect of the claim handling process, for example negotiating the amount of money paid to the claimant. Negotiation includes various elements such as a settlement target range, current demands and offers, supporting strengths and opposing assertions, which provides a claimant and a claim handler the information needed to negotiate a settlement the claimant may receive for an event. (Specification page 170, lines 1-30 and specification page 171, lines 1-30). Abbruzzese discloses none of the negotiation-related information.

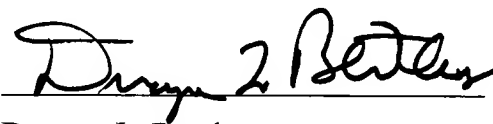
For the foregoing reason, Claim 50 is not anticipated by Abbruzzese et al.



## SUMMARY

Pending Claims 22-51 are patentable. Applicants respectfully request the Examiner grant early allowance of this application. The Examiner is invited to contact the undersigned attorney for the Applicants via telephone if such communication would expedite allowance of this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dwayne L. Bentley", written over a horizontal line.

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